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164395

Area I File

CERRO COPPER PRODUCTS CO.

INTERNAL MEMORANDUM

Other Addressees

P. Tandler
R. Avendt

File

To. J. Burroughs

Date: July 23, 1990

From: J. M. Grana

Subject: Site I Monitoring Wells

Please perform the following activities:

a. Install guards around the groundwater monitoring wells to prevent damage to the wells. The wells to the west of the railroad tracks only need 2" metal posts. However the two wells in the truck parking lot will require the concrete posts. Check with Bob Deatherage, he might have already begun work on these wells.

b. Pump standing water in the wells and determine a method to waterproof the wells using some type of seal to prevent additional water from entering the wells.

c. Draft a letter to the Sauget Fire Department requesting that they not test their hoses over Well-5. This situation was observed on June 26, 1990 by Avendt personnel.

JMG

THE AVENDT GROUP, INC.

ENVIRONMENTAL MANAGEMENT CONSULTANTS

xc. Chandler
R. Avendt
Area I file

July 19, 1990

RECEIVED
JUL 23 1990
E & E AFFAIRS

Mr. Joseph M. Grana
Manager of Environmental Affairs
Cerro Copper Products Company
Post Office Box 66800
St. Louis, MO 63166-6800

RE: Installation of Well Wizard Monitoring Equipment
Cerro Sauget Site I Investigation

Dear Mr. Grana:

The Avendt Group, Inc., completed the installation of the Well Wizard groundwater monitoring equipment for the Cerro Sauget, Site I Investigation. The monitoring equipment was tested after installation to verify its performance. The results of each tests indicated the monitoring equipment performed its intended function. Enclosed please find a summary of events documenting this task.

1.0 SCOPE OF WORK

The Avendt Group, Inc. (AGI), was retained by Cerro Copper Products to install Well Wizard groundwater monitoring equipment for the Sauget, Illinois facility, Site I investigation. The work was performed by AGI staff from the Flint office under the project management of Ivan Cooper.

2.0 SUMMARY

Eight (8) well clusters were installed under AGI supervision in September, 1989, to be utilized in the Site I investigation. Dedicated sampling equipment was purchased for the eight (8) deep wells and eight (8) intermediate wells. Seven (7) of the deep wells and one (1) of the intermediate wells were installed with the dedicated monitoring equipment on February 15, 1990 (refer to Table 1). The monitoring pump fitting for Well Cluster Up - 1 Deep (WCD-1D) failed during installation and was returned to QED for repairs.

A member of The Marmon Group of companies

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(313) 233•6270 • FAX (313) 233•3430

On June 25 and 26, 1990, AGI personnel returned to the Cerro Sauget facility to install the remaining dedicated monitoring equipment in the one (1) deep well; seven (7) intermediate wells; and seven (7) shallow wells. The monitoring equipment for the seven shallow wells was constructed on-site prior to installation. Measurements of the seven (7) shallow wells were conducted to accurately identify well depths and the screened interval of each well (refer to Table 2).

After all of the monitoring pumps were installed in the wells, a test was conducted to verify that each pump was functioning properly. A portable generator and pump control unit was purchased for the sampling from QED. All of the monitoring pumps were tested on June 26, 1990, and each pump was capable of providing a water sample from its designated well.

During the installation of the monitoring equipment on June 25 and 26, 1990, several observations were noted in regards to the well clusters.

An initial walk-through of the Site I area was conducted upon arrival to the facility and seven (7) of the eight (8) well clusters were visible. Well Cluster Down - 3 (WCD-3) was covered by approximately one foot of soil.

The six (6) down gradient wells had a spray painted number on the concrete skirt surrounding the manhole cover. The numbers did not correspond to the actual well cluster identification numbers.

Well Cluster Up - 5 (WCU-5) was covered by a parked trailer.

Water was observed in the concrete cylinder that protects each well cluster. The water apparently enters from the manhole cover. No seal was found beneath the manhole covers to prevent water from entering. Each of the clusters had standing water within the concrete cylinders. In well clusters WCD-2; WCD-3; WCD-4; and WCU-5 the standing water was above the top of the wells and had to be bailed out prior to installation of the monitoring equipment. The wells covered by water were capped by a locking well cap. Water levels within the capped wells were approximately eight feet below grade indicating the water in the cylinder had not entered the wells.

On June 26, 1990, the Fire Station adjacent to the Cerro facility was testing hoses on their property. The Fire Department sprayed water was on the parked trailers on and around WCU-5. We suspect there was an additive in the water which produced a slight foam and sheen in the puddles around WCU-5.

3.0 CONCLUSIONS

AGI completed installation of well monitoring equipment and verified the performance of the equipment. Additionally, AGI makes the following recommendations:

- Install guards or fencing around the well clusters to identify the well's presence and to prevent accidental damage to the wells.
- Pump existing water from within each of the concrete cylinders which protects each well.
- Add a waterproof seal between the manhole cover and the concrete cylinder to prevent additional water from entering each cylinder.
- Request that the local fire department not test their hoses over WCU-5 or any other well installation.

Thank you for the opportunity of providing these services to you. Should you have any questions or require further information, please do not hesitate to contact our office.

Sincerely,

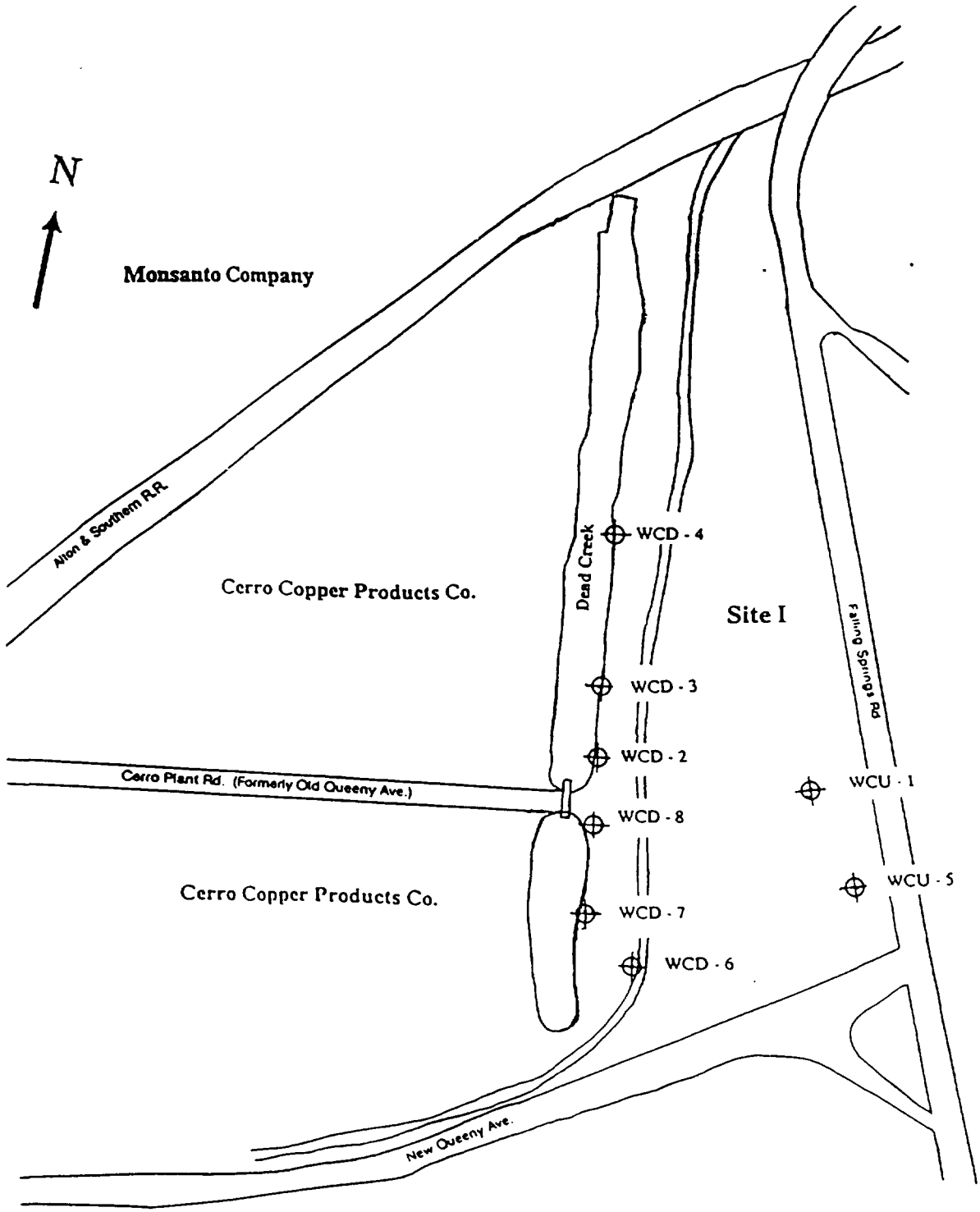
THE AVENDT GROUP, INC.

Ivan A. Cooper, P.E.
Regional Vice-President

IAC:j

cc: Michael Rodburg, Esquire
Lowenstein, Sandler, Kohl, Fisher & Boylan

MWK:j



THE AVENDT GROUP, INC.	
ENVIRONMENTAL MANAGEMENT CONSULTANTS	
TITLE: CERRO COPPER PRODUCTS SAUGET, ILLINOIS SITE INVESTIGATION	
DATE: 7/11/90	DRAWN BY: PAUL OBERLEE
SCALE: NOT TO SCALE	REVISED: P.J.O.
APPROVED BY: M.W.KEYES	
DRAWING NUMBER: FIGURE 1	JOB NUMBER: 88001-02

TABLE 1

WELL WIZARD MONITORING EQUIPMENT
DATE INSTALLED
SITE I INVESTIGATION
CERRO COPPER PRODUCTS
SAUGET, ILLINOIS

WELL CLUSTER ID. NO.	SHALLOW	INTERMEDIATE	DEEP
WCU-1	6/26/90	2/15/90	6/26/90
WCD-2	6/25/90	6/25/90	2/15/90
WCD-3	6/25/90	6/25/90	2/15/90
WCD-4	6/25/90	6/25/90	2/15/90
WCU-5	6/26/90	6/26/90	2/15/90
WCD-6	6/26/90	6/26/90	2/15/90
WCD-7	6/26/90	6/26/90	2/15/90
WCD-8	6/26/90	6/26/90	2/15/90

* The monitoring equipment for WCU-1 Deep was damaged during installation and returned to QED for repairs.

TABLE 2

SHALLOW WELL MEASUREMENTS
SITE I INVESTIGATION
CERRO COPPER PRODUCTS
SAUGET ILLINOIS

SHALLOW WELL ID. NO.	WELL DEPTH	SCREENED INTERVAL	MONITORING EQUIPMENT LENGTH
WCU-1	29.375 ft	10 ft	25.708 ft
WCD-2	23.792 ft	10 ft	19.125 ft
WCD-3	23.875 ft	10 ft	19.208 ft
WCD-4	24.792 ft	10 ft	20.125 ft
WCD-5	*		
WCD-6	23.375 ft	10 ft	18.708 ft
WCD-7	23.542 ft	10 ft	18.875 ft
WCD-8	24.042 ft	10 ft	19.375 ft

* WCU-5 does not have a shallow well

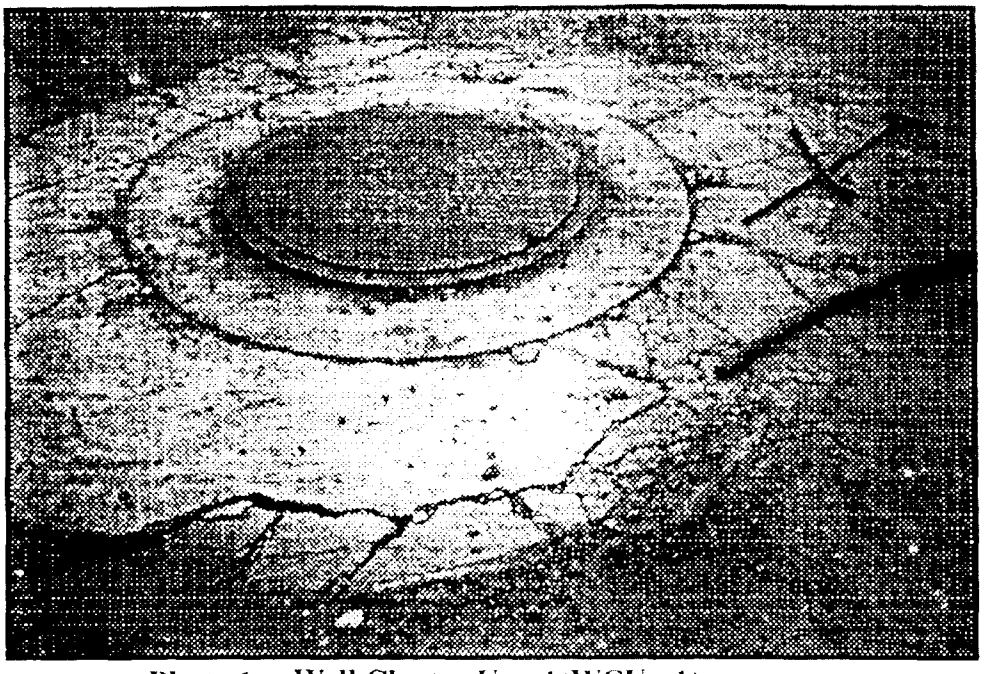


Photo 1: Well Cluster Up - 1(WCU - 1)
Note the broken skirt surrounding the concrete cylinder

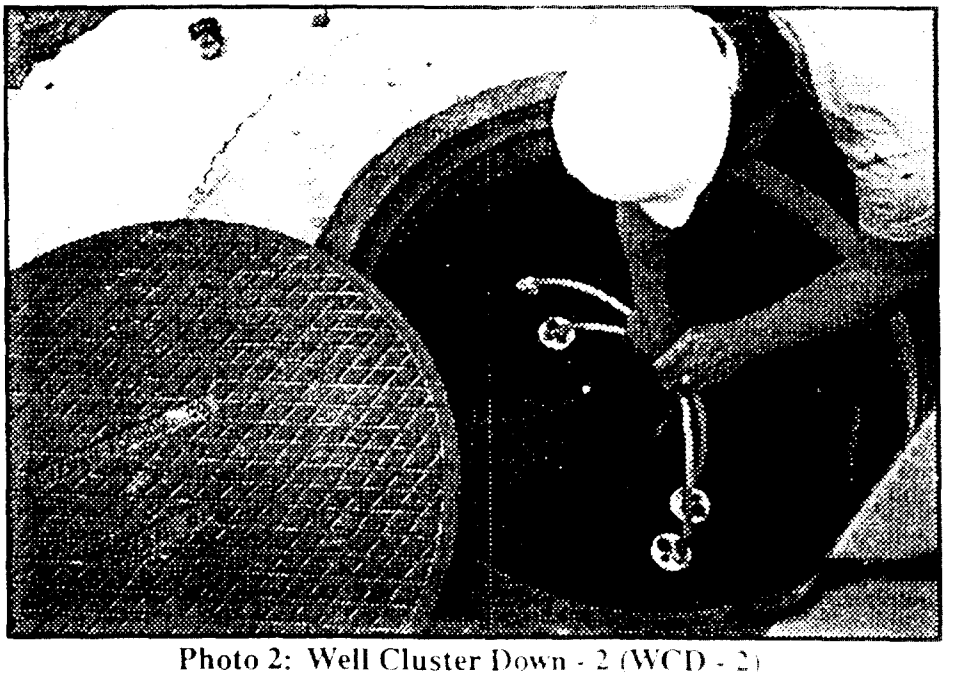


Photo 2: Well Cluster Down - 2 (WCD - 2)

Photo 3: Well Cluster Down - 3 (WCD - 3)
After removing soil covering

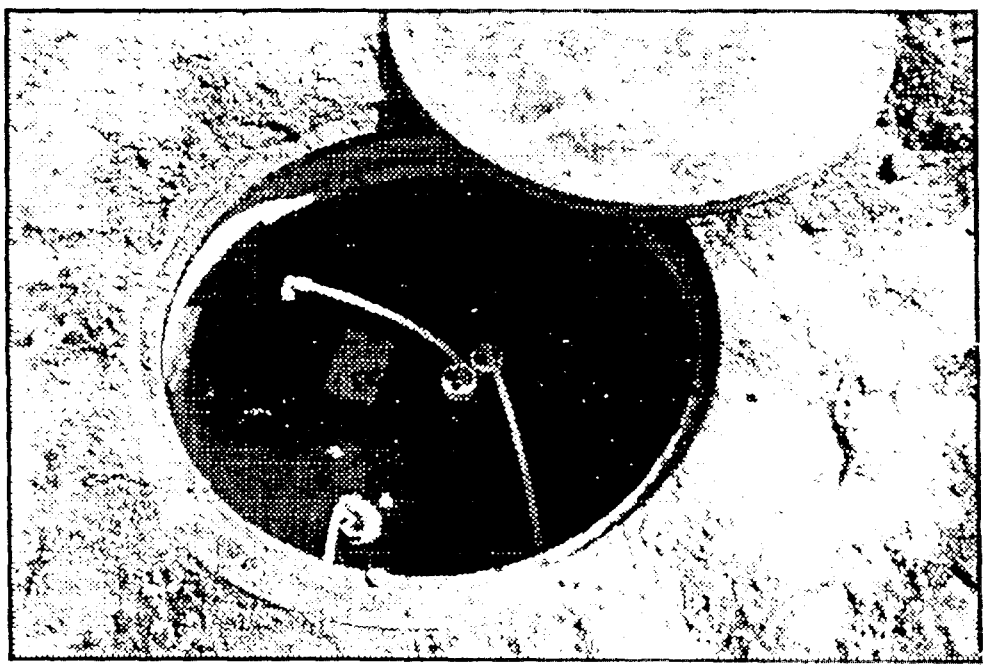


Photo 4: Well Cluster Down - 3 (WCD - 3)

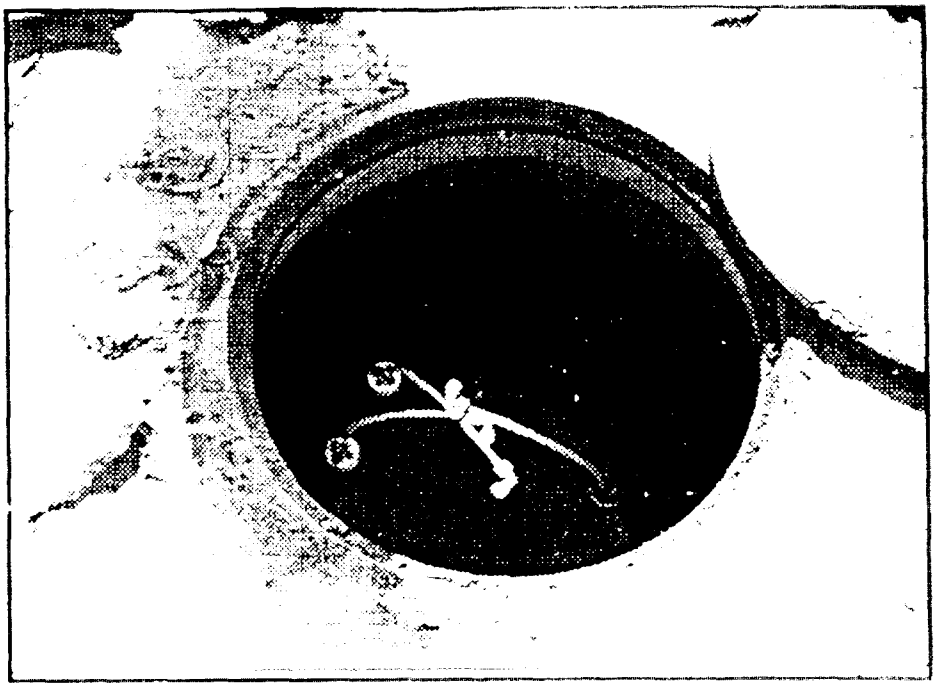


Photo 5: Well Cluster Down - 4 (WCD - 4)

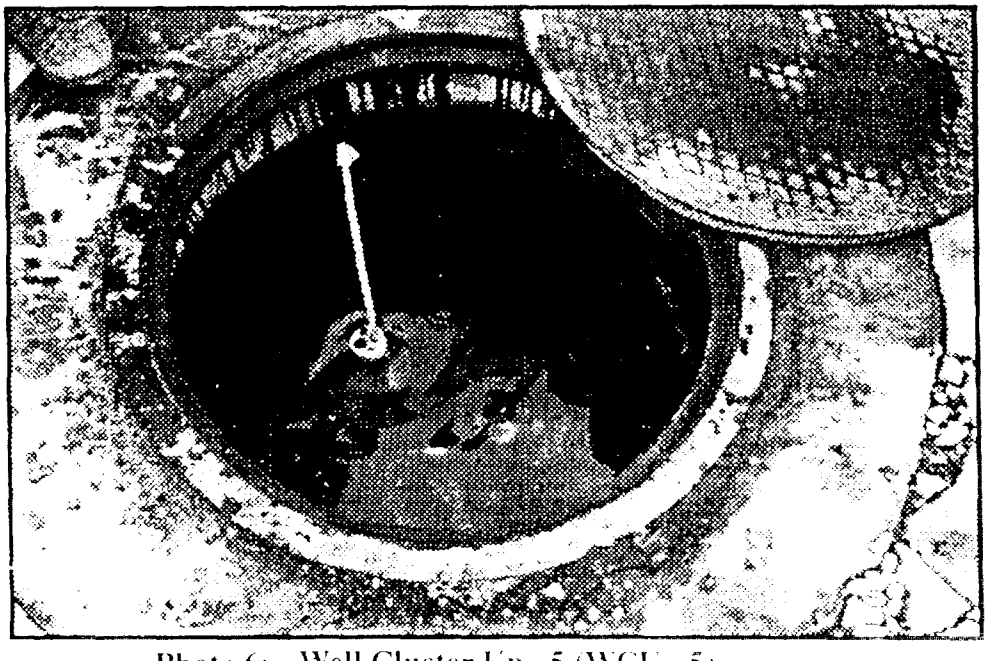


Photo 6: Well Cluster Up - 5 (WCU - 5)
Note water level above the locked well cap

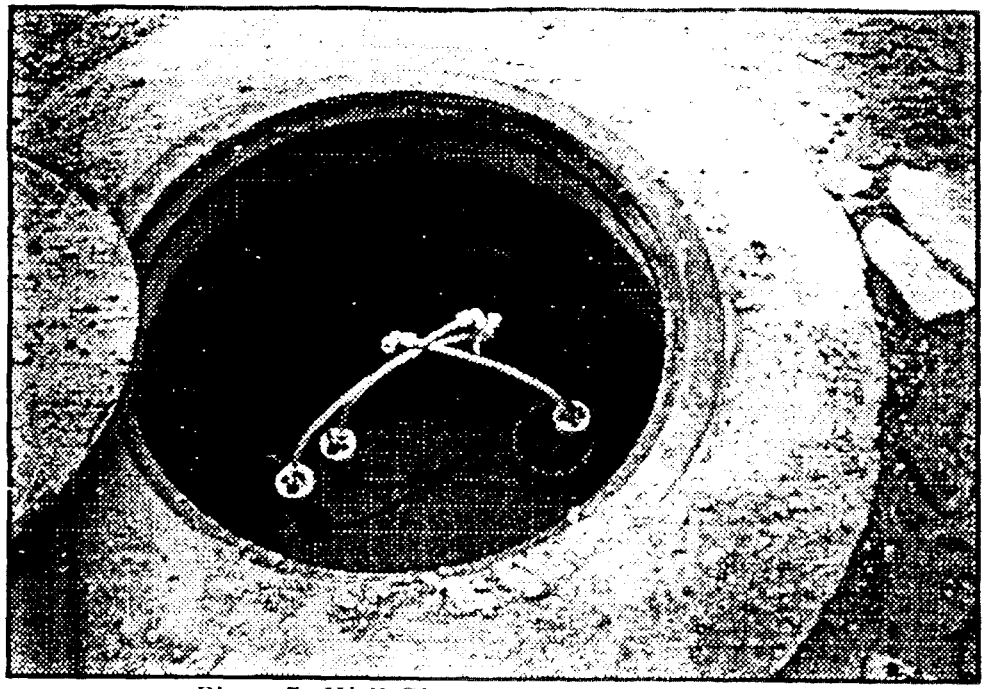


Photo 7: Well Cluster Down - 6 (WCD - 6)

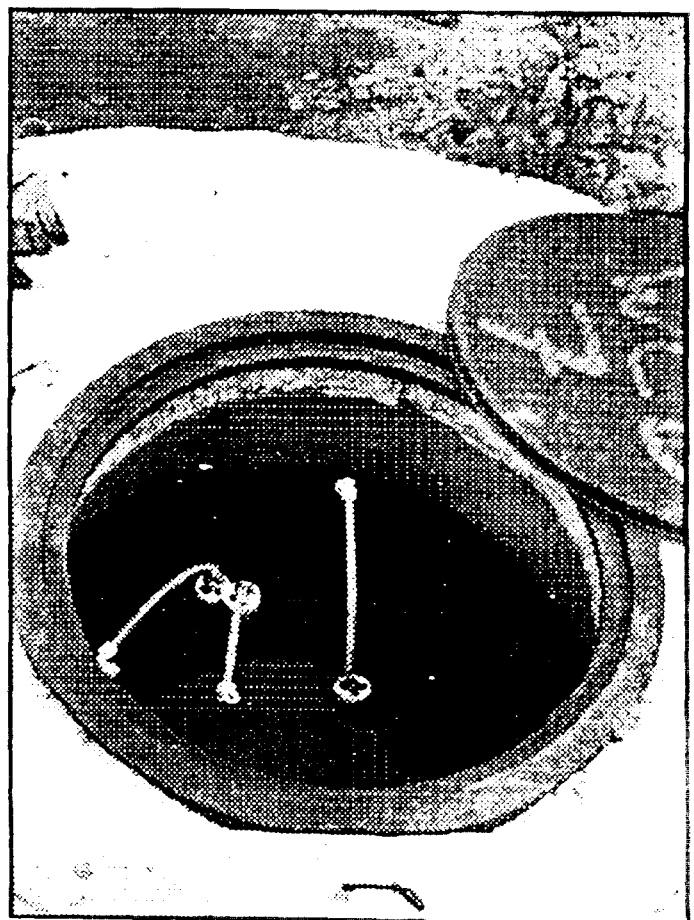


Photo 8: Well Cluster Down - 7 (WCD - 7)

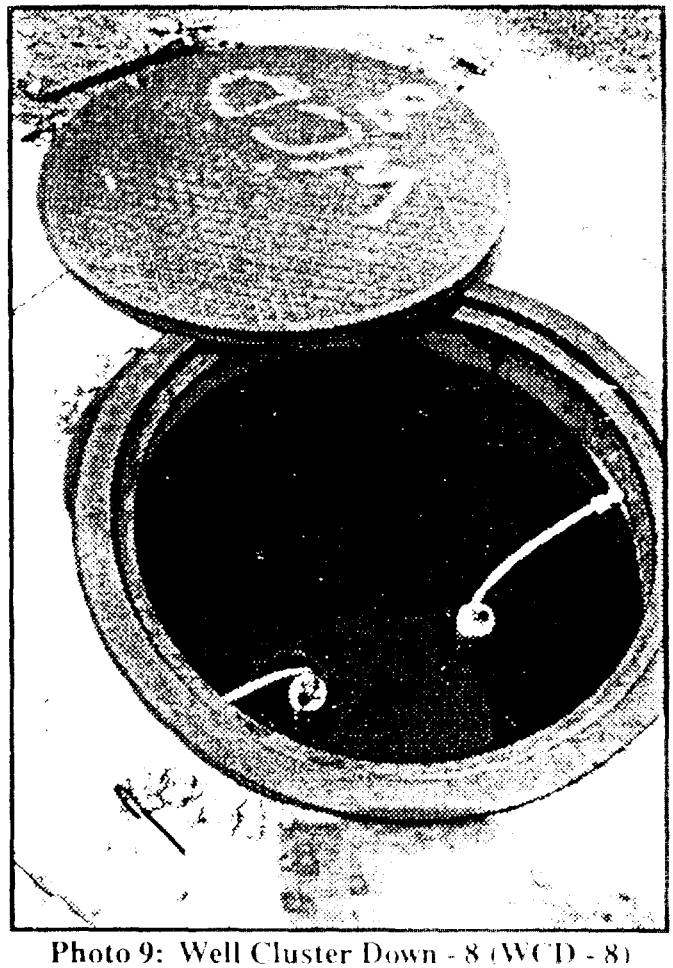


Photo 9: Well Cluster Down - 8 (WCD - 8)

LOWENSTEIN, SANDLER, KOHL, FISHER & BOYLAN

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COUNSELLORS AT LAW

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****FL. BAR ONLY

July 10, 1990

James L. Morgan, Esq.
Assistant Attorney General
Illinois Attorney General's Office
Environmental Control Division
500 South Second Street
Springfield, IL 62706

Re: Sauget Area I

Dear Mr. Morgan:

This will report to you regarding the status of the efforts of certain parties named by IEPA as potentially responsible for one or more of the sites which comprise Area I.

Since the May 31, 1990 PRP meeting with IEPA, a number of the PRP's have participated in several discussions in person and by telephone conference call concerning your request for a PRP financed and performed RI/FS for Area I. A number of issues have been identified, several of which IEPA may be able to address. First, the PRP's do not believe that all parties with potential responsibility have been identified by IEPA. As you know, Monsanto and Cerro shared with IEPA their information on this subject on June 6, 1990. We remain hopeful that additional PRP's will be identified and notified.

Second, most of the identified PRP's are current or recent past owners of properties within the sites comprising Area I who acquired their interests after

disposal activities had ceased, sometimes without knowledge of the antecedent landfilling activities. Not surprisingly, many of these parties regard themselves as innocent landowners or de minimis potentially liable parties and are not willing to contribute substantially to the effort. Our most significant identified need is access to persons or records regarding the identity of transporters and waste generators who used the sites for disposal. The PRP's are contemplating several initiatives to develop this information. Certainly IEPA's assistance in these efforts will be of critical importance.

Despite the obstacles facing the PRP's, we do believe the group is making progress toward a commitment to the RI/FS process. Cerro has affirmed to the PRP's that it is willing to provide administrative leadership for a number of the sites if a sufficient number of PRP's participate in the effort and a satisfactory apportionment of the costs can be attained. Monsanto has expressed interest in a similar commitment for the other Area I sites. Preliminary cost estimates are being prepared and alternative funding arrangements are being considered.

We believe that the PRP's have shown sufficient interest to begin to develop a detailed scope of work for the RI/FS on a site-by-site basis. We suggest that our technical representatives meet with yours to develop the scope of work and work plan.

Of course, this letter is not and should not be construed as a binding commitment on any parties' part at this time. Moreover, this communication is part of settlement discussion and is without admission of any liability and without prejudice to any party.

Very truly yours,

Michael L. Rodburg

MLR/ca

cc: Mr. Paul Takacs
Stephen P. Krchma, Esq.
Mr. Paul Tandler